

From: [Ruelas, Cynthia](#)
To: [Bridgette DeShields](#)
Cc: [dpoma](#); [Wilson, Patrick](#)
Subject: RE: Risk Evaluation Comments
Date: Friday, August 28, 2015 1:54:00 PM

Thanks Bridgette! Patrick is out today, but when he is back in the office next week, I will wait for him to finalize his review on this, and will then give Dennis a call to discuss path forward.

Have a nice weekend!

-Cynthia

.....
Cynthia Ruelas
Environmental Engineer
Permits Section
US Environmental Protection Agency Region 9
75 Hawthorne Street, Mail Code LND-4-2
San Francisco, CA 94105

Tel: (415) 972-3329
Fax: (415) 947-3528
Email: ruelas.cynthia@epa.gov

From: Bridgette DeShields [<mailto:bdeshields@integral-corp.com>]
Sent: Friday, August 28, 2015 1:48 PM
To: Ruelas, Cynthia
Cc: [dpoma](#); [Wilson, Patrick](#)
Subject: RE: Risk Evaluation Comments

Cynthia and Patrick. I spoke to Dennis and answers to your questions are below. Please let us know if you have any additional questions.

From: Ruelas, Cynthia [<mailto:RUELAS.CYNTHIA@EPA.GOV>]
Sent: Thursday, August 27, 2015 4:50 PM
To: Bridgette DeShields
Cc: [dpoma](#); [Wilson, Patrick](#)
Subject: Risk Evaluation Comments

Hello Bridgett,

As a follow-up to our conversation earlier today, I wanted to provide you with some of the questions/comments we had on the risk evaluation for the PCB release at the Kapalama Military Base.

1. Please provide a discussion on potential marine environmental impacts from subsurface PCB releases to adjacent lagoon, including potential fish consumption (either recreational or subsistence) of contaminated biota.
- It is unlikely that the release had any impact on the adjacent lagoon. The spill was a result

of vandalism and there is no evidence of a historic release. The area of the spill was localized and approximately 760 feet from the shoreline; there are no storm drains in the immediate vicinity of the spill. Furthermore, the lagoon is offshore of an industrial area such that recreational fishing and fish consumption from that area specifically, although possible, is not likely.

2. Please provide additional clarification as to why the PCB concentration gradient seems to increase with depth. The physical chemistry of PCBs suggest they should bind or absorb tightly to soils & therefore their mobility is limited. Are there potential co-solvency issues or preferential pathways which help explain the increasing concentration gradient with depth?

- There were telephone poles in the area of the release that likely provided a preferential pathway for migration of PCBs.

Thanks,
Cynthia

.....
Cynthia Ruelas
Environmental Engineer
Permits Section
US Environmental Protection Agency Region 9
75 Hawthorne Street, Mail Code LND-4-2
San Francisco, CA 94105

Tel: (415) 972-3329
Fax: (415) 947-3528
Email: ruelas.cynthia@epa.gov